

**UNITED STATES DISTRICT COURT
EASTERN DISTRICT OF NEW YORK**

IN RE AKAZOO S.A. SECURITIES
LITIGATION

Case No. 1:20-cv-01900-BMC

CLASS ACTION

**NOTICE OF MOTION AND MOTION FOR AN AWARD OF
ATTORNEYS' FEES AND REIMBURSEMENT OF LITIGATION EXPENSES**

TO THE CLERK OF THE COURT AND ALL PARTIES AND THEIR ATTORNEYS OF RECORD:

PLEASE TAKE NOTICE that, pursuant to the Court Order Preliminarily Approving Partial Class Action Settlement and Providing for Notice (ECF No. 36), on September 7, 2021 at 10:00 a.m., before the Honorable Brian M. Cogan, in Courtroom 8D South of the United States Courthouse, Eastern District of New York, 225 Cadman Plaza East, Brooklyn, NY 11201, Court-appointed Class Counsel, The Rosen Law Firm, P.A. and Glancy Prongay & Murray LLP (collectively, “Class Counsel”), on behalf of all Plaintiffs’ Counsel, will and hereby do move the Court for entry of an Order awarding attorneys’ fees in the amount of one-third of the \$4,900,000 Class Action Settlement Amount (*i.e.*, \$1,633,333, plus interest) and one-third of any Additional Settlement Amount allocated to the Class Actions, as well as reimbursement of Litigation Expenses in the total amount of \$83,267.98 (comprised of \$62,267.98 in out-of-pocket costs incurred by counsel and the aggregate amount of \$21,000 for Plaintiffs’ costs and expenses directly related to their representation of the Settlement Class).¹

This motion is based on this Notice of Motion; the memorandum of law in support thereof; the Declaration of Phillip Kim and Casey E. Sadler in Support of: (I) Plaintiffs’ Motion for Final Approval of Partial Class Action Settlement and Plan of Allocation; and (II) Class Counsel’s Motion for an Award of Attorneys’ Fees and Reimbursement of Litigation Expenses; all exhibits thereto; all pleadings and papers filed herein; arguments of counsel; and any other matters properly before the Court.

A proposed order will be submitted on reply.

¹ Capitalized terms that are not otherwise defined herein have the same meanings given to them in the Stipulation and Agreement of Partial Settlement dated April 22, 2020 (ECF No. 32).

Dated: August 3, 2021

Respectfully submitted,

THE ROSEN LAW FIRM, P.A.

/s/ Phillip Kim

Phillip Kim

Laurence M. Rosen

275 Madison Avenue, 40th Floor

New York, New York 10016

Telephone: (212) 686-1060

Facsimile: (212) 202-3827

Email: pkim@rosenlegal.com

Email: lrosen@rosenlegal.com

GLANCY PRONGAY & MURRAY LLP

Casey E. Sadler (admitted *pro hac vice*)

Joseph D. Cohen (admitted *pro hac vice*)

1925 Century Park East, Suite 2100

Los Angeles, California 90067

Telephone: (310) 201-9150

Facsimile: (310) 201-9160

Email: csadler@glancylaw.com

Email: jcohen@glancylaw.com

Class Counsel for the Settlement Class

CERTIFICATE OF SERVICE

I hereby certify that the foregoing document was electronically filed with the Clerk of Court via the CM/ECF system, which will send Notice of such filing to all counsel of record.

Dated: August 3, 2021

/s/ Phillip Kim

Phillip Kim